# REQUEST FOR PUBLIC COMMENTS ON HAWAII'S DRAFT REGIONAL HAZE STATE IMPLEMENTATION PLAN (RH-SIP) FOR THE SECOND IMPLEMENTATION PERIOD (2018-2028) (Docket No. 22-CA-PA-08)

In accordance with 40 Code of Federal Regulations (CFR) §51.102 and Hawaii Administrative Rules §11-60.1-10, the Department of Health, State of Hawaii (DOH) is accepting comments on the subject draft RH-SIP for the second implementation period of the U.S. Environmental Protection Agency's (EPA's) Regional Haze Rule (RHR).

The proposed RH-SIP revision contains federally enforceable permit limits to address requirements of the RHR to 1) improve visibility on the most impaired days and 2) ensure no visibility degradation occurs on the clearest days for each Class I area in the state (Haleakala National Park on Maui Island and Hawaii Volcanoes National Park on Hawaii Island). These goals and long-term strategies for achieving the goals are included in RH-SIPs covering each ten-year period up to 2064. Hawaii has committed to implement its long-term strategy to improve visibility including fuel switching to ultra-low sulfur diesel and other requirements to shut down units within this second regional haze planning period. Pursuant to 40 CFR §51.308(f) of the RHR, Hawaii's RH-SIP includes the following key elements:

- Calculations of baseline, current, and natural visibility conditions; progress to date; and the uniform rate of progress for each Class I area Chapter 3;
- Statewide emission inventories of visibility impairing pollutants Chapter 4;
- Source screening including an analysis with Q/d, a more sophisticated weighted emissions potential/ area of influence (WEP/AOI) analysis, and supplemental analysis Chapter 5;
- Source specific four-factor analyses of facilities screened Chapters 6 and 7;
- Long-term strategy for regional haze including federally enforceable emission limitations and compliance schedules - Chapter 7 and Appendix P with draft permits;
- Reasonable progress goals based on the regional haze controls selected Chapter 8;
- A progress report addressing the requirements of 40 CFR §51.308(g)(1) through (5) Chapter 9;
- Monitoring strategy and other implementation plan requirements Chapter 9; and
- Documentation of consultation with EPA, Federal Land Managers (FLMs), and the regulated industry Chapter 9.

A regional haze consultation meeting was held on May 19, 2022, to discuss comments from the FLMs on Hawaii's draft RH-SIP pursuant to 40 CFR §51.308(i)(2). The National Park Service (NPS) Air Resources Division; NPS Interior Regions 8, 9, 10, and 12; and several national park units in Hawaii hosted the RH-SIP consultation meeting with the Hawaii Department of Health Clean Air Branch (DOH-CAB). Representatives from the U.S. Fish and Wildlife Service and the EPA (Region 9) also attended the meeting.

From their review, the FLMs concluded that there may be additional cost-effective opportunities to control nitrogen oxide (NO<sub>x</sub>) emissions from four (4) larger diesel engines (M10–M13) at the Maalaea Generating Station on Maui. As indicated at the consultation meeting, these engines are responsible for 69% of the facility's total NO<sub>x</sub> emissions. The FLMs stated that the draft RH-SIP could be improved by more robust justification for the cost of emission controls for these engines. The NPS analysis of selective catalytic reduction (SCR) control costs for these engines, found that they may be below the cost-effectiveness threshold established by the state. The FLMs requested that DOH staff consider their cost estimates for Maalaea engines M10–M13 and update cost estimates for the facility if appropriate. The FLMs further recommend that Hawaii DOH staff require SCR for these engines as a technically feasible cost-effective control to reduce NO<sub>x</sub> emissions if revised cost-effectiveness estimates are below the established threshold. The NPS supports Hawaii DOH-CAB's request for a vendor quote as this would provide the highest level of certainty for evaluating the cost-effectiveness of SCR for these engines.

After further review of the four-factor analysis for the Maalaea Generating Station to address comments from the FLMs, the DOH-CAB determined that the four-factor analysis for Maalaea Generating Station is incomplete. Therefore, additional review to determine potential control measures for the Maalaea Generating Station will be addressed in a SIP revision.

The four-factor analyses for the Mauna Loa Macadamia Nut Corporation Plant on Hawaii Island was also determined to be incomplete and is still being worked on. Potential control measures for the Mauna Loa Macadamia Nut Corporation Plant will be address in the SIP revision.

The following is a link to Hawaii's draft RH-SIP for the second planning period (2018-2028):

# https://health.hawaii.gov/cab/public-notices/

The documents can be viewed in person at the following locations, Mon-Fri, 8 a.m.-4 p.m. (except on state holidays):

## Oahu:

 Clean Air Branch, Department of Health 2827 Waimano Home Road, Suite #130, Pearl City, Oahu 96872

## Hawaii:

- Hawaii District Health Office, Department of Health 1582 Kamehameha Ave., Hilo, Hawaii 96720
- Clean Air Branch Kona, Keakealani Building, Department of Health 79-1020 Haukapila Street, Room 113, Kealakekua, Hawaii 96750

### Kauai:

 Kauai District Health Office, Department of Health 3040 Umi St., Lihue, Kauai 96766

## Maui:

 Maui District Health Office, Department of Health 54 High St., Room 300, Wailuku, Maui 96793

Copies may be requested for a fee of five (5) cents/page plus postage. Please send written requests to the Clean Air Branch listed above or call Mr. Michael Madsen at the Clean Air Branch at (808) 586-4200 to request a copy.

All written comments on Hawaii's draft RH-SIP must be addressed to the Clean Air Branch at the above address on Oahu and must be postmarked or received by July 24, 2022. Any person may request a public hearing by submitting a written request to the above address on Oahu that explains the person's interest and reasons why a hearing is warranted. If requested, a virtual public hearing will be held at 9:00 a.m. on August 2, 2022. Information on the public hearing will be posted on the Department of Health's website at: <a href="https://health.hawaii.gov/cab/public-notices/">https://health.hawaii.gov/cab/public-notices/</a> at least thirty (30) days in advance of the scheduled hearing date. If no request for a public hearing is received, we will post a cancellation notice on the Department of Health's website on July 25, 2022. Please contact Mr. Madsen to find out if the hearing has been cancelled.

DOH will make a final decision on the RH-SIP after considering all comments and will send notice of the final decision to each person who has submitted comments or requested such notice.

The DOH will initiate another public comment period at a later date after completing Hawaii's RH-SIP revision to address potential regional haze control measures for the Mauna Loa Macadamia Nut Corporation Plant and Maalaea Generating Station.

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